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MEMO ENDORSED

March 20, 2021

By ECF/EmailThe Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007*United States v. Anilesh Ahuja*, 18 Cr. 328 (KPF)

Dear Judge Failla:

We write briefly in response to the government's letter filed this morning. We apologize to the government and to the Court for not seeking the government's view before filing our letter.

As to the requested extension itself, we note that the issues before the Court involve an extensive record that played out over the course of years, and included discovery, pre-trial motion practice, Rule 17(c) subpoenas, trial, post-trial proceedings, a stayed appeal, further post-trial proceedings, and a defense FOIA request. The issues likewise involve multiple cooperating witnesses and their lawyers. Our request for more time to prepare our motions is not based on a desire to prolong or delay these proceedings, but rather to present the Court with what we believe are serious issues in as efficient a form as possible.

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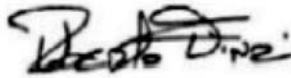
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The Honorable Katherine Polk Failla

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With respect to the government's conflicts, we are of course willing to accommodate any scheduling issues that bear on the government's opposition and, if the Court allows it, oral argument on the motions. We reached out to the government shortly after receiving their letter this morning but have not yet heard back and wanted to submit this letter before the Court ruled on our request.

Respectfully submitted,



Roberto Finzi

Richard C. Tarlowe

cc: Counsel of Record

The Court is in receipt of Defendants' letter motion dated March 19, 2021, requesting a three-week extension of the briefing deadlines (Dkt. #440), the Government's response in opposition (Dkt. #441), and Defendants' above reply (Dkt. #442). Taking into account the time Defendants have had to date to prepare their motions, the explanation for the requested extension, and the prejudice such an extension would cause to the Government because of imminent parental leave, the Court determines that a shorter extension of one week is appropriate.

Accordingly, the briefing schedule is revised as follows: Defendants' opening briefs shall be filed on or before **April 2, 2021**; the Government's opposition shall be filed on or before **April 23, 2021**; and Defendants' replies shall be filed on or before **May 14, 2021**.

The Clerk of Court is directed to terminate the motion at docket entry 440.

Dated: March 21, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE